

**REMARKS**

**STATUS OF THE CLAIMS:**

Claims 1-6 and 8 have been pending.

Claims 1-6 and 8 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schiefer et al., U.S. Patent Application No. 2004/0249644, hereinafter referred to as "Schiefer," in view of Bolene, U.S. Patent Publication No. 2003/0163329, hereinafter referred to as "Bolene."

In accordance with the foregoing, the claims are amended and new claims 9-11 are added, and, thus, the pending claims remain for reconsideration, which is respectfully requested

No new matter has been added.

The Examiner's rejections are respectfully traversed.

**OBJECTIONS TO THE DRAWINGS:**

The Office Action, at item 4, objects to FIGS. 19, 20 and 21 under 37 C.F.R. § 1.84(p)(4) "because reference character '14' has been used to designate both Part A and Part B of multiple event management databases."

Applicants respectfully disagree with the Examiner's characterization that the event management database 14 as seen in Part A and Part B of, for example, FIG. 19 are different event management databases. Applicants respectfully submit that one skilled in the art would recognize that the event management database 14 as seen in Part A and Part B of FIG. 19 are the same database, but at different stages, that is, Part A of FIG. 19 shows that event management database 14 at a first stage and Part B of FIG. 19 shows the event management database 14 at a second stage.

Furthermore, 37 C.F.R. § 1.84(p)(4) recites:

The same part of an invention appearing in more than one view of the drawing must always be designated by the same reference character, and the same reference character must never be used to designate different parts.

Accordingly, Applicants respectfully submit that FIGS. 19-21 comply with the requirements of 37 C.F.R. § 1.84(p)(4) because the drawings designate the same part of the embodiment seen in the figures with the same reference characters. Accordingly, withdrawal of the drawing objection is respectfully requested.

**35 U.S.C. § 112 REJECTIONS:**

The Office Action, at items 6-7, rejects claims 1-6 and 8 under 35 U.S.C. § 112, second paragraph, as allegedly “being incomplete for omitting essential elements...the ‘event queue’ see page 11 paragraph 0031...”

Applicants respectfully disagree with the Examiner’s assertion that an “event queue” is an omitted essential element. One skilled in the art would recognize that a “queue” is merely one of a multitude of interchangeable methods for collecting and retrieving/processing data. Furthermore, Applicants respectfully submit that every element recited in the claims is correctly tied together. Accordingly, Applicants respectfully submit that there is no omitted essential element in the claims.

The Examiner, in the Response to Arguments, asserts “it is vague as to which element provides the operation means.” In accordance with the foregoing, claims 9 to 11 are added, clarifying that in one possible embodiment, the “event data is collected in an event queue,” as recited, for example, in claim 10.

Accordingly, withdrawal of the 35 U.S.C. §112, second paragraph rejection, is respectfully requested.

**35 U.S.C. § 103(A) REJECTIONS:**

Independent claims 1, 6 and 8 are allegedly unpatentable over Schiefer in view of Bolene.

In accordance with the foregoing, claims 1, 6 and 8 are amended to recite, using claim 6 as an example, in part:

storing a plurality of business data used in the plurality of business systems and business process definition information defining a relation between the plurality of business data by using relative properties;

Support for the claim amendment can be found, for example, at paragraphs [0020], [0036] and [0040].

The Office Action relies upon Schiefer, at paragraphs 55-56, to reject the claimed embodiment.

Applicants respectfully disagree with the assertion, because Schiefer at paragraphs 55-56, recites:

[0055] FIG. 1 shows two storage devices, the data warehouse 110

and the Operational Data Store 111. The data warehouse 110 would typically be a large (e.g., gigabytes or terabytes) data storage and is used in the present invention to store and provide large amounts of data, similar to conventional systems. However, such large data storage may be too slow for a near real-time system.

[0056] Therefore, the present invention may be implemented to have a second, smaller memory, the Operational Data Store 111 for quick access of smaller amounts of data. However, other configurations, such as an extremely fast, parallel data warehouse memory would be possible, albeit more expensive.

In other words, Schiefer at paragraphs 55-56 discusses two storage devices, the data warehouse 110 and the Operational Data Store 111. However, Schiefer at paragraphs 55-56 clearly fails to disclose, either expressly or implicitly, to one skilled in the art the claimed "storing a plurality of business data used in the plurality of business systems and business process definition information defining a relation between the plurality of business data by using relative properties," because Schiefer, at paragraphs 55-56, merely discusses storage devices.

The Office Action further asserts that Schiefer, at paragraphs 130-131 and 138-145, discloses the claimed "grouping the collected event data by said plurality of business systems based upon the stored business process definition information and the relative properties included in the collected event data, and relating as the grouped event data among the plurality of business systems based upon the plurality of business data," as recited, for example, in claim 6.

Applicants respectfully disagree, because Schiefer, at paragraph 130-131 recites:

[0130] ETL applications can be divided into modules which include a set of event adapters, ETlets, or evaluators. A module has a separate deployment descriptor for the configuration of the components within the module. There are three ways of packaging event adapter, ETlets and evaluator components: 1) each component is put into a separate module, 2) several components are packaged into one module, and 3) all application components are packaged into one single module. The decision on which packaging strategy is most appropriate depends on the application size and the deployment requirements.

[0131] FIG. 9 illustrates a typical hardware configuration of an information handling/computer system in accordance with the invention and which preferably has at least one processor or central processing unit (CPU) 911.

In other words, Schiefer, at paragraph 130-131, discusses the configuration of the ETL (extraction, transformation, loading) elements, i.e. the event adapters, ETlets, and evaluators.

While Schiefer discusses, at paragraph 54, lines 1-2, "ETLets 103 implement the ETL processing tasks which can include ... data matching 107...", Schiefer fails to disclose, either expressly or implicitly, the claimed "grouping the collected event data by said plurality of business systems based upon the stored business process definition information and the relative properties included in the collected event data, and relating ~~as the~~ grouped event data among the plurality of business systems based upon the plurality of business data."

Applicants respectfully submit that Schiefer's "data matching" fails to enable one skilled in the art to modify Schiefer to include the claimed "grouping the collected event data by said plurality of business systems based upon the stored business process definition information and the relative properties included in the collected event data, and relating ~~as the~~ grouped event data among the plurality of business systems based upon the plurality of business data," because Schiefer fails to disclose, either expressly or implicitly, the claimed "plurality of business data used in the plurality of business systems and business process definition information defining a relation between the plurality of business data by using relative properties" used to group and relate the event data.

The Office Action relies upon Bolene merely to disclose the claimed "outputting the related event data in a tree form," as recited, for example, in independent claim 6. Therefore, Applicants respectfully submit that Bolene fails to correct the deficiencies in the Schiefer reference.

Accordingly, Applicants respectfully submit that a prima facie case of obviousness cannot be based upon Schiefer and Bolene, because there is no evidence that one skilled in the art would modify Schiefer, Bolene or any combination thereof to include the claimed "storing a plurality of business data used in the plurality of business systems and business process definition information defining a relation between the plurality of business data by using relative properties; collecting event data from the plurality of business systems, the event data extracted in the plurality of business systems ~~and being comprising the relative properties and~~ information showing an execution status of each of a plurality of applications, the plurality of applications executing the plurality of businesses; grouping the collected event data by said plurality of business systems based upon the stored business process definition information and the relative properties included in the collected event data, and relating ~~as the~~ grouped event data among the plurality of business systems based upon the plurality of business data; storing the related event data; and outputting the related event data in a tree form by retrieving the event

data from the stored event management data based upon input retrieval conditions,” and see the benefit of tracking events having same relative properties from a plurality of business systems.

In a non-limiting example, relation of business data is defined, for example, by relation properties such as relative keys or various IDs, and, the event data can include the relative properties (see, for example, paragraphs [0020], [0036] and [0040]).

Thus, according to the embodiments, events which have the same relative properties can be grouped to track the relationship there between.

Applicants respectfully submit that independent claims 1 and 8 patentably distinguish over the cited references for similar reasons as independent claim 6.

Dependent claims recite patentably distinguishing features of their own or are at least patentably distinguishing due to their dependence from the independent claims. Withdrawal of the rejection of pending claims, and allowance of pending claims is respectfully requested.

#### **NEW CLAIMS:**

As discussed above, new dependent claims 9-11 recite patentably distinguishing features of their own or are at least patentably distinguishing due to their dependence from the independent claims.

#### **CONCLUSION**

It is respectfully submitted that the foregoing has demonstrated that claims 1-6 and 8-11 patentably distinguish over the references and rejections of record.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

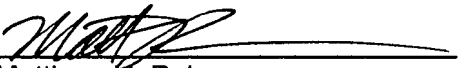
Serial No. 10/823,562

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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